

JAMES L. JACOBS, State Bar No. 158277
ROBERT W. LUCKINBILL, State Bar No. 131977
GCA LAW PARTNERS LLP
1891 Landings Drive
Mountain View, CA 94043
Telephone: (650) 428-3900
Facsimile: (650) 428-3901

Attorneys for Defendant
DRS Tactical Systems, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

PALPILOT INTERNATIONAL
CORPORATION, a California corporation

Plaintiff,

vs.

DRS TACTICAL SYSTEMS, INC., a
Florida corporation, and DOES 1 to 10,
inclusive

Defendant

No. C07 02481 RS

SECOND FURTHER STIPULATION TO
EXTEND THE TIME WITHIN WHICH
TO ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT FOR
DAMAGES

[Pursuant to Local Rule 6.1 (a)]

WHEREAS, Plaintiff Palpilot International Corporation ("Palpilot") initially
commenced this action in the Superior Court of California in and for the County of Santa
Clara, as Case Number 107CV0833091;

WHEREAS, Defendant DRS Tactical Systems, Inc. ("DRS Tactical") filed a Notice
Of Removal Of Action Pursuant To 28 U.S.C. § 1441(b) ("Notice of Removal") with the
United States District Court for the Northern District of California on May 8, 2007;

WHEREAS, the initial deadline for DRS Tactical to answer or otherwise respond to
the Complaint ("Complaint") was May 16, 2007;

1 WHEREAS, the initial deadline for Palpilot to file a motion to remand, pursuant to
2 U.S.C. § 1447(c), is 30 days after the filing of the Notice of Removal, or June 7, 2007;

3 WHEREAS, pursuant to three earlier stipulations, the parties agreed to extend the
4 deadlines for (a) DRS to answer or otherwise respond to the Complaint (to June 21, 2007)
5 and (b) Palpilot to file a motion to remand pursuant to U.S.C. § 1447(c) (to July 12, 2007).

6 WHEREAS, the parties remain engaged in the informal exchange of information
7 and settlement discussions in an effort to determine whether an early resolution of the
8 dispute can be reached and agree that they would like to minimize the costs of the litigation
9 pending those efforts;

10 WHEREAS, the parties wish to further extend the deadline for DRS Tactical to
11 answer or otherwise respond to the Complaint and for Palpilot to file its motion to remand
12 should it choose to do so pending the parties' efforts to exchange information and discuss
13 settlement;

14 WHEREAS, the parties agree that the contemplated extension of this deadline will
15 not alter the date of any event or any deadline already fixed by Court order in this matter.

16 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE
17 PARTIES HERETO THROUGH THEIR RESPECTIVE COUNSEL, AS FOLLOWS:

18 1. DRS Tactical shall have until July 18, 2007 to answer or otherwise respond
19 to the Complaint.

20 2. Palpilot shall have until August 6, 2007 to file a motion to remand pursuant
21 to U.S.C. § 1447(c).

22 3. Counsel for DRS Tactical hereby attests that the concurrence of Mr. Lew,
23 counsel for Palpilot, to file this Stipulation has been obtained.

24 Dated: June 20 2007

GCA LAW PARTNERS LLP


James L. Jacobs

Attorneys for Defendant
DRS Tactical Systems, Inc.

1 Dated: June 20, 2007

STEPHEN K. LEW, PROF. LAW CORP.



Stephen K. Lew

Attorneys for Plaintiff
Palpilot International Corporation

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Second Further Stipulation to
Extend Time

-3-